

UNITED STATES OF AMERICA

- v. -

CHONG SIK YU,
a/k/a "Chris Yu," and
YUNSEO LEE,

Defendants.

20 Cr.

20 CRIM 648

CHONG SIK YU,
a/k/a "Chris Yu," and
YUNSEO LEE,

Defendants.

COUNT ONE

(Conspiracy to Unlawfully Export
Dual-Use Electronics Components)

The Grand Jury charges:

1. From at least in or about 2019, up to and including in or about 2020, in the Southern District of New York and elsewhere, CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the Export Control Reform Act.

2. It was a part and an object of the conspiracy that CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, would and did agree to export and to

cause to be exported from the United States items controlled under Subchapter I of the Export Control Reform Act, to wit, electronic components, telecommunications components, and sensors, to Hong Kong and the People's Republic of China, without having first obtained a license for such export from the U.S. Department of Commerce.

(Title 50, United States Code, Sections 4819(a)(1), 4819(a)(2)(A), (B), (C), (D), (E), (F), & (G), and 4819(b), and 15 C.F.R. § 736.2(b)(1).)

COUNT TWO

(Conspiracy to Commit Wire Fraud and Bank Fraud)

The Grand Jury further charges:

3. From at least in or about 2019, up to and including in or about 2020, in the Southern District of New York and elsewhere, CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349.

4. It was a part and an object of the conspiracy that CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to

be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, and pictures for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

5. It was further a part and an object of the conspiracy that CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, would and did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the FDIC, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT THREE

(Conspiracy to Launder Money)

The Grand Jury further charges:

6. From at least in or about 2019, up to and including in or about 2020, in the Southern District of New York and elsewhere, CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, knowingly and willfully combined, conspired, confederated, and agreed together and with each other

commit money laundering, in violation of Title 18, United States Code, Section 1956.

7. It was a part and an object of the conspiracy that CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, monetary instruments and funds to places in the United States from and through places outside the United States, in amounts exceeding \$10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, conspiracy to commit wire fraud and bank fraud as charged in Count Two of this Indictment, in violation of Section 1956(a)(2)(A) of Title 18, United States Code.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

(As to Count Two)

8. As a result of committing the bank and wire fraud conspiracy offense alleged in Count Two of this Indictment, CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense

alleged in Count Two of this Indictment, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

FORFEITURE ALLEGATION

(As to Count Three)

10. As a result of committing the money laundering offense alleged in Count Three of this Indictment, CHONG SIK YU, a/k/a "Chris Yu," and YUNSEO LEE, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money

laundering offense and all property traceable to such property, including but not limited to, a sum of money representing the amount of property that was involved in the money laundering offense or is traceable to such property.

Substitute Assets Provision

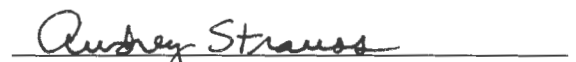
11. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982;
Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)


FOREPERSON


AUDREY STRAUSS
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CHONG SIK YU,
a/k/a "Chris Yu," and
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Defendants.

INDICTMENT

20 Cr.

(Title 50, United States Code, Sections
4819(a)(1), 4819(a)(2)(A), (B), (C),
(D), (E), (F), & (G), and 4819(b);
Title 18, United States Code, Sections
1349 and 1956(h).)

AUDREY STRAUSS

Acting United States Attorney.

A TRUE BILL



Foreperson.
